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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 07-cv-05944-JST
MDL No. 1917

This Document Relates to:

ALL INDIRECT PURCHASER
ACTIONS

**DECLARATION OF QIANWEI FU IN
SUPPORT OF INDIRECT PURCHASER
PLAINTIFFS' RESPONSE TO MOTION TO
VACATE OR CLARIFY 2010
STIPULATION AND ORDER (DKT. 799)**

Hearing Date: June 6, 2019
Time: 2:00 p.m.
Courtroom: 9, 19th Floor
Judge: Honorable Jon S. Tigar

1 I, Qianwei Fu, declare:

2 1. I am an attorney duly licensed by the State of California and am admitted to
3 practice before this Court. I am a partner with the law firm Zelle, LLP (formerly Zelle,
4 Hofmann, Voelbel & Mason, LLP) (“Zelle”) and my firm serves as counsel for the Indirect
5 Purchaser Plaintiffs (“IPPs”) in the above-captioned action. I submit this Declaration in support
6 of the IPPs’ Response to Motion to Vacate or Clarify 2010 Stipulation and Order, filed herewith.
7 The matters set forth herein are within my personal knowledge and if called upon and sworn as a
8 witness I could competently testify regarding them.

9 2. Barbara Caldwell, the named plaintiff for Massachusetts at the inception of this
10 litigation, was initially represented by Henry Cirillo of The Furth Firm, LLP.

11 3. In or around May 2008, The Furth Firm combined certain of its personnel and
12 resources with Zelle. As part of this agreement, Mr. Cirillo and several other attorneys from The
13 Furth Firm joined Zelle in May 2008.

14 4. This agreement also provided that Zelle would take over responsibility for certain
15 of The Furth Firm’s cases and clients. These cases and clients included the CRT case and
16 Barbara Caldwell. Mr. Cirillo remained as the attorney contact for Ms. Caldwell, however.

17 5. After the transition of The Furth Firm to Zelle, Zelle requested that Ms. Caldwell
18 sign a retention agreement. But Ms. Caldwell never signed the retention agreement.

19 6. Mr. Cirillo left Zelle and joined another firm in March 2010. Mr. Cirillo then filed
20 a Notice of Appearance on behalf of the “direct purchaser plaintiffs.” ECF No. 653.

21 7. I made several attempts to contact Ms. Caldwell over the course of several months
22 in 2010 but she did not respond. I therefore concluded that Ms. Caldwell no longer wished to
23 pursue her claim.

24 8. I informed Lead Counsel of my efforts to contact Ms. Caldwell and my conclusion
25 that Ms. Caldwell did not wish to pursue her claim.

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1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct. Executed this 17th day of May 2019 at San Francisco, California.

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4 /s/ Qianwei Fu

5 Qianwei Fu

6 ***Counsel for the Indirect Purchaser Plaintiffs***
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